

Chin, Vivian

From: Eric Meyer <emeyer@Langan.com>
Sent: Tuesday, January 28, 2014 5:18 PM
To: Chin, Vivian
Cc: Bob Koto
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations update 1-28-2014

Vivian,

The non-hazardous PCB impacted wood block disposal operations were implemented 1/16-1/28. During this period the weather played havoc with the transportation end of the operation, and was cause for multiple days of cancelled operations. However they are done as of today. Confirmatory disposal documentation will be forwarded upon receipt.

In response to your question of floor size.....

The floor plans for each of the Buildings (4 & 5) are slightly different, however the floor sizes are roughly the same. Field measurements identify the floors in Building 4 as being approximately 18,500 square feet each, while the floors in Building 5 are approximately 20,000 square feet each.

EJM

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
Mobile: 973.216.2413

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From: Eric Meyer
Sent: Wednesday, January 15, 2014 12:54 PM
To: 'Chin, Vivian'
Cc: Bob Koto (bkoto@Langan.com)
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-15-2014

Yes. Just give me a day or two, as I am a little crazy here with another emergency!!

EJM

P.S. they will start on site with the wood block load out tomorrow!!

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
Mobile: 973.216.2413

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From: Chin, Vivian [mailto:Chin.Vivian@epa.gov]
Sent: Wednesday, January 15, 2014 12:52 PM
To: Eric Meyer
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-15-2014

Your welcome. Could you give me the total square feet of material involved?

Thanks,
Vivian L. Chin
U.S. Environmental Protection Agency - Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue, MS-105
Edison, NJ 08837
phone: 732-906-6179; fax: 732-321-6788
chin.vivian@epa.gov

From: Eric Meyer [mailto:emeyer@Langan.com]
Sent: Wednesday, January 15, 2014 12:47 PM
To: Chin, Vivian
Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net; rhaim@moishes.com; fran@fmparkerlaw.com; Kristina Hoshovsky (kristina@fmparkerlaw.com)
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-15-2014

Vivian,

Thanks for the expedited service!!

EJM

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
Mobile: 973.216.2413

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From: Chin, Vivian [mailto:Chin.Vivian@epa.gov]
Sent: Wednesday, January 15, 2014 12:38 PM
To: Eric Meyer
Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014 III

Eric,

The Approval modification letter is attached.

Thanks

Vivian L. Chin

U.S. Environmental Protection Agency - Region 2

Pesticides & Toxic Substances Branch

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phone: 732-906-6179; fax: 732-321-6788

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From: Eric Meyer [<mailto:emeyer@Langan.com>]

Sent: Tuesday, January 14, 2014 3:10 PM

To: Chin, Vivian

Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net

Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014 III

Thanks for the effort!!!!

EJM

Eric Meyer

Senior Project Manager

Direct: 201.398.4587

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From: Chin, Vivian [<mailto:Chin.Vivian@epa.gov>]

Sent: Tuesday, January 14, 2014 3:09 PM

To: Eric Meyer

Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net

Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014 II

I should hopefully be able to let you know by COB tomorrow whether I can get it to you by 1/16.

Thanks,

Vivian L. Chin

U.S. Environmental Protection Agency - Region 2

Pesticides & Toxic Substances Branch

2890 Woodbridge Avenue, MS-105

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From: Eric Meyer [<mailto:emeyer@Langan.com>]
Sent: Tuesday, January 14, 2014 2:56 PM
To: Chin, Vivian
Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014 II

Thanks.

I will not transport/dispose until I receive the signed modification from your office. That way we are all on the same page.

EJM

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
Mobile: 973.216.2413

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From: Chin, Vivian [<mailto:Chin.Vivian@epa.gov>]
Sent: Tuesday, January 14, 2014 2:51 PM
To: Eric Meyer
Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net
Subject: RE: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014

Eric,

I'll try to get the modification letter signed by my management tomorrow but I can't guarantee it. The regulations provide for 14 days advance notice of a modification for our written response but I'll do what I can.

Thanks,
Vivian L. Chin
U.S. Environmental Protection Agency - Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue, MS-105
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From: Eric Meyer [<mailto:emeyer@Langan.com>]
Sent: Tuesday, January 14, 2014 2:34 PM
To: Chin, Vivian
Cc: Haklar, James; Bob Koto; jbolowski@controldemo.net
Subject: 50 Dey Street PCB material storage and continued disposal operations 1-14-2014

Vivian,

In response to our continuing communications regarding the non-hazardous PCB impacted wood block material storage, I have reviewed the project files as sourced from Keystone E-Sciences Group, Inc. (KES). Based on this review, all non-hazardous PCB impacted wood block materials that had been staged on site, up to and including July 8, 2013, were transported to the Gloucester County Landfill. It is further understood that continued staging of non-hazardous PCB impacted wood block material was reinitiated during the week of July 15, 2013, and lasted approximately another 7-10 days.

Given the results of the aforementioned research, it is concluded that the materials that were removed and staged on site the week of July 15, 2013 and July 22, 2013 are rapidly coming close to their storage expiration period of 180 days. To this end, the disposal subcontractor selected by the Client is ready to initiate off-site disposal of the staged materials to the Tunnel Hill facility this Thursday, January 16, 2014. It is anticipated that the disposal operations will last 3-4 days depending upon the number of trucks available for the transportation operations.

I know previous communications indicated you did not expect a problem getting the final Approval Modification for the Tunnel Hill disposal facility. Can I secure same on/before this Wednesday so we can start transportation on Thursday?

Thank you in advance

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
Mobile: 973.216.2413

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From: Eric Meyer
Sent: Thursday, January 09, 2014 11:46 AM
To: 'Chin, Vivian'
Cc: Haklar, James; Bob Koto
Subject: RE: 50 Dey Street PCB discussion update & disposal facility approval status 1-9-2014

Thanks for the quick response. I will work on the storage question, and respond mid/late next week (as I am out of town for the next 4-5 days due to family emergency). We will also consider the project strategy and give you an update.

Regards,

EJM

Eric Meyer
Senior Project Manager
Direct: 201.398.4587
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From: Chin, Vivian [<mailto:Chin.Vivian@epa.gov>]
Sent: Thursday, January 09, 2014 11:44 AM
To: Eric Meyer
Cc: Haklar, James; Bob Koto
Subject: RE: 50 Dey Street PCB discussion update & disposal facility approval status 1-9-2014

Eric,

As we touched on during our conversation, I see no issue with the change in disposal facility to an alternate solid waste permitted landfill. We plan to issue an Approval modification reflecting this change. I would like to receive more information/documentation on the material that has been in storage for disposal. Please provide verification on the quantity and length of time that material has been in storage on site. What is the earliest date the material in storage, which is now to be sent to Tunnel Hill Partners, was put in storage for disposal?

I did have the opportunity to speak to Jim and he concurs that 761.61(b) is an option and could be considered for portions of the building. If you plan to send the scarified material for TSCA disposal then there would be no need to further characterize those portions beforehand. Note that 761.61(b) does not address verification sampling, however, all PCB contaminated material over 1 ppm must be removed for TSCA disposal. Other portions of the building which have not been adequately characterized would still need to be addressed. If you choose to go in that direction then future submissions should specify where you have opted to utilize 761.61(b) provisions and provide for delineation of areas still to be addressed per 761.61(a).

Thanks,
Vivian L. Chin
U.S. Environmental Protection Agency - Region 2
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2890 Woodbridge Avenue, MS-105
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From: Eric Meyer [<mailto:emeyer@Langan.com>]
Sent: Thursday, January 09, 2014 10:48 AM
To: Chin, Vivian
Cc: Haklar, James; Bob Koto
Subject: 50 Dey Street PCB discussion update & disposal facility approval status 1-9-2014

Vivian,

Thank you for affording me several minutes of your time earlier this morning. As discussed the purpose of the call was to stay in touch, and briefly discuss the response letter your office provided regarding the SIP II, and the "new" non-hazardous PCB wood block disposal location.

After review of the response letter you provided, we have reflected on several of the comments and requirements identified therein. As we briefly discussed, delineation of the PCB impacted concrete is required by regulation, prior to

any potential remedial action for same. This effort may realize itself to be expensive, and time consuming, given the potential scope of the project.

As a potential alternate you mentioned the possibility of a performance based disposal via 761.61 (b) wherein PCB remediation may be completed, all remediation must achieve <1 kg/mg (PPM), and all materials disposed in a TSCA landfill. In utilizing this potential strategy no additional delineation sampling would be required, however verification sampling would be required to prove remediation was successful to the 1 PPM limit.

This alternative strategy will be reviewed to assess the cost effectiveness of same, recognizing the TSCA disposal requirements for all materials! Once we review, I will reach out to you regarding the refined strategy and any potential non-site specific general regulatory questions; and determine if/what reporting would be required.

In regards to "new" " non-hazardous PCB wood block disposal location (Tunnel Hill), you indicated that it looks like it will be approved, and a confirmation of this approval will be forthcoming shortly. We also discussed the retention time of the materials on site verses the regulatory limits of 6 months. I will review the available records to determine when the materials were generated, what has been disposed of site at the previously approved facility (GCIA landfill), and the retention time of the remaining materials. I expect that the previous disposal efforts managed the oldest staged materials within the initial 6 moth window, and with the forthcoming approval (and a rapid response by the client) we should be able to manage the remaining material on site within the 6 moth window that reflects their date of generation. I will get back to you with confirm on this mid/late next week.

Again thanks for your time, and we look forward to the approval of the "new" Tunnel Hill facility shortly.

Respectfully,

Eric Meyer
Senior Project Manager

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Mobile: 973.216.2413
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